

# **KRK Consulting LLC**

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February 28, 2020

US EPA (REGFEE)

Office of Pesticide Programs

Room S-4900, One Potomac Yard

2777 South Crystal Drive

Arlington, VA 22202-4501

Subject: New Registration for Livinguard, AG  
Product "Fabric Treated with Livinguard Technology"  
EPA Reg. No. 95700-R

Please accept the application for a new registration for the product, "Fabric Treated with Livinguard Technology" that is a non-integrated system containing four registered active ingredients. The efficacy study was conducted following two protocol submissions to the US EPA as MRID 49358101 (package identified as 90072PA4). The first submission resulted in a review conducted by Dr. Laniyan identified as DB Barcode D417735 dated 4/14/14. The protocol was modified and resubmitted resulting in a follow-up review identified as DB Barcode D433725 dated 6/7/16. In addition to the two reviews, there were numerous phone conversations regarding this technology, so it would be advisable for Dr. Laniyan to be involved in the review of the submitted efficacy study.

Also, initially the company involved in this technology was Healthprotex LLC, but Livinguard, AG acquired the assets of Healthprotex LLC including all studies. Thus, some of the studies were sponsored by Healthprotex LLC, but all the studies are being submitted to the US EPA by Livinguard, AG.

Within this packet, the following information is included:

- Transmittal Document
- Receipts for three payments (tracking number 75544238384; 75864242649; 75922715147) for a total of \$5,363.00. The action code for is "A540."
- Letter of authorization allowing KRK Consulting LLC to represent Livinguard, AG in all matters related to the U.S. EPA.
- Letter stating that Livinguard AG has acquired all the assets of Healthprotex LLC.

Application for the Registration for "Fabric Treated with Livinguard Technology" that includes:

- Five (5) copies of proposed EPA Label with CD that contains pdf of proposed label.
- Form 8570-1 Application Form
- Form 8570-34 Certification with Respect to Citation of Data
- Form 8570-27 Formulator's Exemption (2 pages)
- Form 8570-4 Confidential Statement of Formulas (Wet and Dry)

- Form 8570-35 Data Matrix (Total of 6 pages)
- Request for Waiver for Acute Inhalation Toxicity
- Request for Waiver for Primary Eye Toxicity
- Request for Waiver for Acute Oral Toxicity
- Acute Dermal Toxicity in Rats.
- Primary Skin Irritation in Rabbits
- Dermal Sensitization Test in Guinea Pigs – Buehler Method
- Product Chemistry Subgroup A.
- Product Chemistry Subgroup B.
- Absorption Study by Livinguard AG
- Enforcement Analytical Validation for PHMB.
- Enforcement Analytical Validation for Silver Ions.
- Enforcement Analytical Validation for Propiconazole.
- Enforcement Analytical Validation for 3-(trimethoxysilyl) propyldimethyloctadecyl ammonium chloride.
- Efficacy study “Antimicrobial Efficacy Study of Treated Fabric with Livinguard Technology”.

Your cooperation in processing this application in an expedient manner is greatly appreciated. Please call me at 440-263-7305 if you should have any questions.

Best Regards,



Kevin R. Kutcel,  
Agent for Livinguard, AG